

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No. 22- <u>10056</u> -TPA
	:	(Chapter 13)
WAYNE V. LEWIS	:	Judge Thomas P. Agresti
	:	
Debtor.	:	
	:	
WAYNE V. LEWIS	:	Document No.
	:	
Movant,	:	Related to Document No.
	:	
vs.	:	
	:	
WILMINGTON SAVINGS FUND	:	
SOCIETY, FSB	:	
	:	
Respondent.	:	
	:	

RESPONSE OF THE DEBTOR, WAYNE V. LEWIS, TO THE COURT ORDER
DATED AUGUST 12, 2022 ON THE OBJECTION TO THE ALLOWANCE
OF THE CLAIM OF WILMINGTON SAVINGS FUND SOCIETY, FSB
PURSUANT TO 11 U.S.C. § 502 AND BANKRUPTCY RULE 3007

Now comes the Debtor, WAYNE V. LEWIS, by and through counsel,
MICHAEL J. GRAML, ESQ., and respectfully represents as follows:

1. The United States Bankruptcy Court issued an Order dated August 12, 2022 in regard to the pending matter [Doc. Nos. 25, 26, 28, 30, 34, 36 and 37] where the Bankruptcy Court directed Counsel for Debtor to review the ***Certification of Counsel Regarding Pre-Petition Attorney's Fees and Costs*** ("Certfication") and file any objection(s) thereto.

2. Counsel for Debtor previously served Interrogatories over additional concerns over the pre-petition arrearage. Those answers are due in approximately one (1) week.

3. Counsel for Debtor would request an extension of time for discovery to be completed for the receipt of the additional documentation and/or interrogatories from the mortgage company.

WHEREFORE, the Debtor prays for an extension of time to complete the limited discovery that has been initiated and GRANTING the Debtor such other and further relief as may be just and proper.

Respectfully submitted,

Dated: August 18, 2022

/s/ MICHAEL J. GRAML
MICHAEL J. GRAML, ESQ.
Attorney for Debtor/Movant
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CERTIFICATE OF SERVICE OF RESPONSE OF THE DEBTOR, WAYNE V. LEWIS,
TO THE COURT ORDER DATED AUGUST 12, 2022 ON THE OBJECTION TO
TO THE ALLOWANCE OF THE CLAIM OF
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PURSUANT TO 11 U.S.C. § 502 AND BANKRUPTCY RULE 3007

I certify under penalty of perjury that I served the above captioned pleading, proposed Order of Court and Notice of Hearing on the parties at the addresses specified below or on the attached list on **August 18, 2022**.

The type(s) of service made on the parties (first class mail, electronic notification, hand delivery, or another type of service) was: **Electronic Notification and First Class Mail.**

ELECTRONIC NOTIFICATION:

Ronda J. Winnecour, Esq.
Office of the Chapter 13 Trustee
USX Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
cmecf@chapter13trusteedpa.com

SERVICE BY FIRST CLASS MAIL:

Michael Clark, Esq.
Richard M. Squire & Assoc., LLC
115 West Avenue, Suite 104
Jenkintown, PA 19046

Statebridge Company, LLC
6061 S. Willow Drive
Greenwood Village, CO 80111

ELECTRONIC NOTIFICATION:

Office of the U.S. Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15219
ustpreregion03.pi.ecf@usdoj.gov

SERVICE BY FIRST CLASS MAIL:

Wilmington Savings Fund
Society, FSB
Attn: Rodger Levenson
Chairman, President and Chief Executive Officer
500 Delaware Avenue
Wilmington, DE 19801

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification and those served by mail will be listed under the heading Service by First Class Mail.

EXECUTED ON:

August 18, 2022

/s/ MICHAEL J. GRAML
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